



City of Seattle

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Gregory J. Nickels, Mayor  
**Department of Planning and Development**  
Diane M. Sugimura, Director

**CITY OF SEATTLE  
ANALYSIS AND DECISION OF THE DIRECTOR  
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**Application Number:** 2402177  
**Applicant Name:** Irma Dore of Unico Properties  
**Address of Proposal:** 1301 4<sup>th</sup> Avenue

**SUMMARY OF PROPOSED ACTION**

Master use permit to change use of an existing administrative office and establish use for future construction of 93 residential units. Project includes construction of 8,700 square foot addition within the existing structure. Existing retail and customer service offices at street level to remain. No change in parking.

The following approval is required:

**SEPA - Environmental Determination**  
(Chapter 25.05, Seattle Municipal Code (SMC))

**SEPA DETERMINATION**

☐ Exempt ☐ DNS ☐ MDNS ☐ EIS

☒ DNS with conditions

☐ DNS involving non-exempt grading or demolition or involving another agency with jurisdiction.

**BACKGROUND DATA**

**Site and Vicinity Description**

The 148,365 square foot project site is zoned Downtown Office Commercial 1 with a height designation of 450 feet (DOC1-450). The site consists of an entire half block on the west side of 4<sup>th</sup> Avenue between Union and University Streets, and is part of the 10 acre Metropolitan Tract owned by the University of Washington. The site is developed with two buildings, the Cobb Medical building and the Puget Sound Plaza building. The scope of work for this project only involves the Cobb building which is on the south portion of the site.

The surrounding property is zoned DOC1-450 to the south, east and west, but transitions to a less intense Downtown Retail Commercial zone with height designation of 85 and 150 feet (DRC 85-150) to the north.

### Proposal

The proposal consists of alterations to the 11-story Cobb building and converting it from administrative and customer service office to 93 residential dwelling units. The ground level commercial spaces will remain. The project includes the construction of 8,700 square feet of new structural core and seismic upgrades. Most of the structural core will be interior to the building; however, a small portion will be built at the rooftop penthouse level. No parking is required and none is proposed. Exterior open space will be provided on a 4,585 square foot 2<sup>nd</sup> floor deck and a 250 square foot roof deck. Interior recreation space will be provided in a 672 square foot common room and a 735 square foot basement exercise room.

The existing building is on the National Register of Historic Places, but is not designated as a City Landmark.

### Public Comment

One public comment letter was received during the public comment period which ended on June 30, 2004. The comments expressed in the letter were related to increased congestion in the existing street-level uses.

### ANALYSIS - SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant dated June 3, 2004 and annotated by the Department. The information in the checklist, supplemental information provided by the applicant, project plans, and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 23.05.665) discusses the relationship between the City's code/policies and environmental review. The Overview Policy states, in part, "Where City regulations have been adopted to address an environmental impact; it shall be presumed that such regulations are adequate to achieve sufficient mitigation subject to some limitation". The Overview Policy in SMC 23.05.665 D1-7, states that in limited circumstances it may be appropriate to deny or mitigate a project based on adverse environmental impacts.

The policies for specific elements of the environment (SMC 25.05.675) describe the relationship with the Overview Policy and indicate when the Overview Policy is applicable. Not all elements of the environment are subject to the Overview Policy (e.g., Traffic and Transportation, Plants and Animals and Shadows on Open Spaces). A detailed discussion of some of the specific elements of the environment and potential impacts is appropriate.

### Short-term Impacts

The following temporary or construction-related impacts are expected: decreased air quality due to suspended particulate from building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by construction activities; increased traffic and demand for parking from construction equipment and personnel; conflict with normal pedestrian movement adjacent to the site; increased noise; and consumption of renewable and non-renewable resources.

Several adopted City codes and/or ordinances provide mitigation for some of the identified construction related impacts. Compliance with these applicable codes and ordinances will reduce or eliminate most

short-term impacts, but impacts such as air quality and noise require further discussion and may require SEPA mitigation.

### Air Quality

The Puget Sound Clean Air Agency (PSCAA) regulations require control of fugitive dust to protect air quality and will require permits for removal of asbestos (if any) during demolition. The owner and/or responsible party (ies) are required to comply with the PSCAA rules pertaining to demolition of projects with or without asbestos. This will ensure proper handling and disposal of asbestos, as well as demolition of structures without asbestos. No further SEPA conditioning is necessary.

### Noise

The project is expected to generate loud noise during construction; however, the construction of the structural core is internal to the site. Construction noise is expected to be mitigated by the existing Cobb building to the south and east, and by other buildings to the north and west. There are no known nearby residential or hotel uses north or west of the site. The Fairmont Olympic hotel is located diagonally across the 4<sup>th</sup> Avenue and University Street intersection (southeast direction); however, most noise generated from the construction of the core is expected to be blocked by the existing Cobb building. The Noise Ordinance limits construction noise to between the hours of 7:00 AM and 10:00 PM on weekdays and between the hours of 9:00 AM and 10:00 PM on weekends. In this case, the Noise Ordinance sufficiently mitigates construction noise and no SEPA conditioning is necessary.

### Long-term Impacts

Long-term or use-related impacts are also anticipated as a result of approval of this proposal including: alteration to a building on the National Register of Historic Places; increased bulk and scale on the site; increased demand for public services and utilities; increased energy demand; increased ambient noise associated with increased human activity and vehicular movement.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Seattle Building Code which provides prescriptive construction techniques and standards; and the Land Use Code which controls site coverage, setbacks, building height and use and contains other development and use regulations to assure compatible development. Compliance with these applicable codes and ordinances is adequate to achieve sufficient mitigation of most long term, although some impacts warrant further discussion and possible mitigation.

### Traffic and Parking

The trip generation from the proposed building is not expected to have a significant adverse impact on traffic conditions or reduce the level of service at nearby intersections. The project consists of establishing residential dwelling units which only minimally contribute towards peak hour vehicle trips. Vehicle trips associated with office uses typically have more impact on traffic in that they generate more peak hour trips relative to residential. The office use is being removed and replaced by residential.

Downtown is well-served by transit and is a large employment center. Vehicle ownership rates are low in the Downtown area because of the transit opportunities and close proximity to where people work. In light of that, no mitigation of traffic impacts under SEPA is necessary for this project. The Seattle SEPA policy provides no authority to mitigate the impact of development on parking availability in downtown zones (SMC 25.05.675M).

### Historic Preservation

The Cobb building is on the National Register of Historic Places and is not a City Landmark. The City of Seattle Historic Preservation regulations do not apply to this property in that it is owned by a State agency, the University of Washington.

According to the State Office of Historic Preservation, the project is seeking Federal tax credits which are available when rehabilitating historic structures and is subject to Federal and State Historic Preservation regulations. To obtain tax credits, the rehabilitation work needs to be in accordance with the Secretary of the Interior's Standards for Rehabilitating Historic Buildings. The same Secretary of the Interior's Standards are often used locally in the City of Seattle when evaluating impacts to historic buildings and whether or not to allow alteration of a City Landmark.

The SEPA Overview Policy (SMC 25.05.665E), Relationship to Federal, State and Regional Regulations states that the City may defer to another agency with jurisdiction. The State Office of Historic Preservation has jurisdiction in this case and compliance with their regulations will adequately mitigate impacts to this historic building. No SEPA conditioning is necessary.

### Other Impacts

The other impacts such as but not limited to, increased bulk and scale, increased ambient noise, and increased demand on public services and utilities are minor in scope or otherwise mitigated by codes and are not sufficiently adverse to warrant further mitigation by condition.

### **DECISION - SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirements of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030 2c.
- [ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030 2c.

### **CONDITIONS –SEPA**

None.

Signature: (signature on file) Date: December 16, 2004  
Jess E. Harris, AICP, Senior Land Use Planner